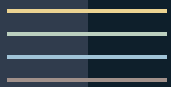


WIKBORG | REIN



# Sustainability Report 2025

OSLO | BERGEN | STAVANGER | LONDON | SHANGHAI | SINGAPORE

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Sustainability Report 2025

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## About this report

### Basis for the preparation

Wikborg Rein Advokatfirma AS has prepared this sustainability report in accordance with the European Sustainability Reporting Standard for non-listed small- and medium-sized undertakings (VSME Standard), adopting Option B: Basic Module and Comprehensive Module.

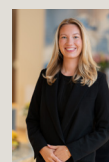
The report has been prepared on an individual basis and covers Wikborg Rein Advokatfirma AS and all of its offices in Oslo, Bergen, Stavanger, London, Shanghai and Singapore. No information has been omitted on the grounds of being classified or commercially sensitive.

Disclosure item	Information
Legal form	Private limited liability company (aksjeselskap/ AS)
NACE sector classification	M69.10 – Legal activities
Balance sheet (EUR)	111 257 818
Turnover (EUR)	158 582 845
Number of employees	414 (per 31 December 2025)
Country of primary operations	Norway (headquarters: Oslo)
Location of significant assets	Oslo, Bergen, Stavanger (Norway); London (UK); Shanghai (China); Singapore

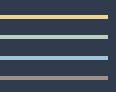


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responsible for our sustainability reporting  
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Anne Marte Enerstvedt,  
Compliance Manager  
[annene@wr.no](mailto:annene@wr.no)



# Introduction and about the business

# A year defined by sustainability, performance, and growth

Wikborg Rein is a firm built on expertise, integrity, and a long term perspective. In 2025, these qualities have been both tested and affirmed.

It has been a landmark year. Mergermarket ranked Wikborg Rein as Norway's most active firm by deal count in the first half of the year – a result that reflects the breadth and depth of expertise across the firm. Technology is reshaping our profession, and this year has been one of significant acceleration.

Artificial intelligence is no longer a future consideration – it is embedded in how we work. Our partnership with Legora enables our lawyers to draw on richer research and analysis, delivering sharper strategic advice to clients while improving consistency across matters. For Wikborg Rein, AI is not about replacing legal judgement – it is about sharpening it.

Sustainability is a strategic priority – not only in how we run our own operations, but in the value we create for clients and society. As the regulatory landscape grows increasingly complex, our clients look to us for guidance – and this is where we believe legal expertise and sustainability can make a real difference.

Internally, we continue to progress on our own sustainability journey. We have initiated the process of setting science-based climate targets in line with the Science Based Targets initiative (SBTi) and have remained committed to the UN Global Compact since we joined in 2020.

Our pro bono scheme reflects our belief that a firm of our standing has responsibilities that extend well beyond client work. I want to highlight one example in particular: our partnership with the Stine Sofie Foundation. Through this collaboration, our lawyers have contributed legal analyses to the Children's Accident Investigation Board – most recently on digital sexual abuse of children, an area where legislation has struggled to keep pace with the realities children face today.

A healthy, safe and inclusive working environment is fundamental to our lasting success. The legal sector has received increased attention from regulators and the public recently, and rightly so – it reflects an overdue conversation about sustainable working practices. We welcome this development and see dialogue with the Norwegian Labour Inspection Authority and other regulators as a genuine opportunity to lead by example.

Our more than 400 professionals continue to deliver outstanding value every day. I am proud of what this team represents – and optimistic about where we are headed.



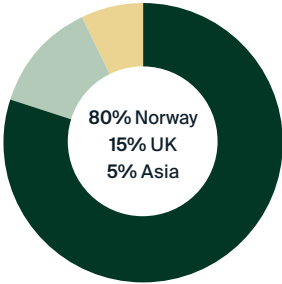
Sincerely,  
**Geir Sviggum**  
Managing Partner, Wikborg Rein



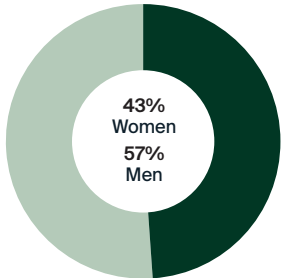
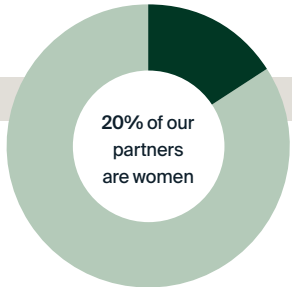
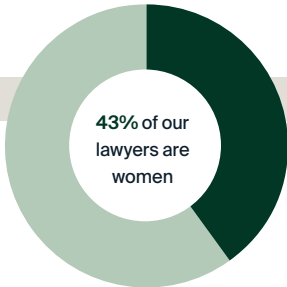
**For Wikborg Rein, AI is not about replacing legal judgement – it is about sharpening it.**

# Our firm at glance\*

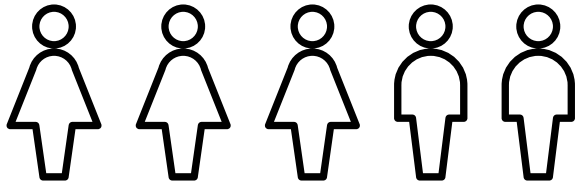
## Our people



**414**  
lawyers and  
business services  
professionals

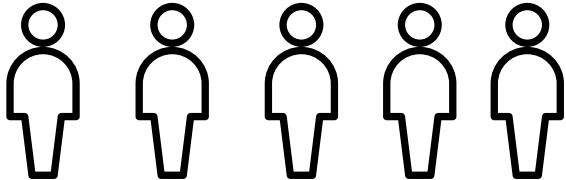


**23**  
nationalities



57% board positions held by women

**22%**  
senior management  
roles held by women



6 offices in  
4 countries

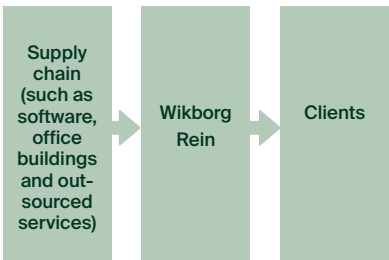


A full service  
law firm

## Our clients

**2,816**  
clients in 2025

## Our supply chain



## Our society

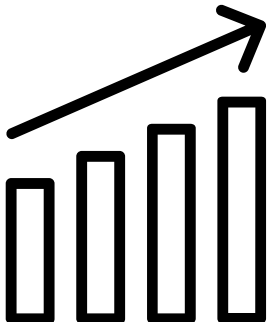


A significant number of our lawyers have dedicated their time to pro bono projects in 2024

**2,349**

pro bono hours in 2024

## Our environment



In 2025, we continued to improve our climate accounting, including further expanding our Scope 3 reporting and enhancing data quality to better reflect our actual emissions. In November 2025, our science based climate targets were approved by the Science Based Targets initiative (SBTi), and we are now focusing on implementing concrete measures to achieve these targets.

\* Per 31 December 2025

# This is Wikborg Rein

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**Wikborg Rein is a full-service international law firm headquartered in Oslo, with offices in Bergen, Stavanger, London, Shanghai and Singapore.**

**W**ith over a century of experience, our exceptional lawyers deliver first-class legal advice across every practice area, serving clients wherever business takes them. Consistently ranked among the world's leading firms by Chambers and Partners and Legal 500, Wikborg Rein is a privately owned limited liability company.

## **BUSINESS MODEL AND KEY SERVICES**

Wikborg Rein is a renowned international law firm headquartered in Oslo, with regional and global offices in Bergen, Stavanger, London, Shanghai and Singapore.

The firm's utmost priority is providing clients with first-class legal assistance, as reflected in its high rankings in prestigious international legal ratings such as Chambers and Partners and Legal 500.

The firm provides a comprehensive range of legal services within business law. Key practice areas include, but are not limited to: Shipping and Offshore, Energy (including renewables and oil & gas), M&A and Corporate Law, Financial Regulations and Capital Markets, ESG and Sustainability, Dispute Resolution, Employment Law, Real Estate, Data Protection and GDPR, and Restructuring and Insolvency. The firm's accomplished lawyers possess extensive expertise and knowledge across most disciplines and industries.

## **KEY MARKETS AND CLIENTS**

Wikborg Rein serves clients across a broad range of sectors, with a particular focus on the maritime, energy, financial services and corporate sectors. In 2025, the firm served 2,816 clients. The firm's client base consists primarily of Norwegian and international corporate clients, financial institutions, and public sector entities. The firm operates across the Norwegian, UK and Asian markets, with offices in four countries reflecting its international focus.

## **KEY BUSINESS RELATIONSHIPS AND VALUE CHAIN**

The firm's value chain on the supplier side consists primarily of software, office premises and outsourced services. You can read more about this in our Transparency Act report on [wr.no](https://www.wikborgrein.no)

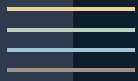
## **SUPPLIER CODE OF CONDUCT AND ETHICAL EXPECTATIONS**

Wikborg Rein has drawn up a Supplier Code of Conduct that outlines the ethical, social and environmental expectations of the firm's suppliers. By adhering to this code, suppliers demonstrate their commitment to responsible business practices, sustainability and ethical conduct. Compliance with the code strengthens the partnership between Wikborg Rein and its suppliers, reduces risk and contributes to a more sustainable and ethical supply chain.

## **SUPPLY CHAIN MONITORING - HUMAN RIGHTS AND WORKING CONDITIONS**

To ensure compliance with human rights obligations, the firm adheres to national and international laws and regulations relating to human rights. This includes the Human Rights Act, the Modern Slavery Act, ILO conventions, the OECD Guidelines for Multinational Enterprises and the Norwegian Transparency Act. The firm's commitment to providing redress for adverse impacts and its approach to identifying and handling complaints are described in the relevant statement.

Wikborg Rein conducts assessments, particularly with regard to forced labour and child labour, and carries out regular reviews to assess associated risks. The Managing Partner, together with the Finance department, the Compliance Manager and the Risk and Quality Partner, has overall responsibility for preventing human rights violations and unethical business practices within the firm.



# Our values

## Integrity

- We show **respect** and **tolerance**, and act responsibly towards each other, our customers, counterparties and the community around us.
- We always comply with the applicable rules of the game, act **reliably**, **ethically** and **professionally** in everything we do.
- We are **open** and **honest**, and keep our promises.

## Skills

- We **recognise each other's** expertise, share **knowledge** and experience across teams and offices, and develop together.
- We all take responsibility in **developing our own expertise** to keep ourselves at the forefront.
- We are **solution-oriented** and maintain high quality in everything we do.

## Dedication

- We are **innovative**, see opportunities rather than limitations, and act quickly.
- We are **ambitious** and **determined**, and work hard.
- We are **forward-leaning** and take **initiative**, dare to ask questions and challenge the status quo.

## Team Spirit

- We are **inclusive** and **collaborative**, showing **enthusiasm** and **generosity** with all customers and colleagues.
- We **sincerely** care and go to great lengths to help customers and colleagues.
- We listen actively, are **curious about** others' ideas, and are inspired by **diversity** in thinking, **expertise**, **experience** and **background**.



# Sustainability strategy

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Law firms play an important and evolving role in supporting the transition toward more sustainable business practices. As regulatory expectations related to environmental, social, and governance (ESG) matters continue to develop, across national, regional, and international levels, the legal landscape is becoming increasingly detailed and interconnected. Recent developments, including more structured reporting frameworks and proportionate standards such as VSME, reflect a broader effort to balance transparency, comparability, and practical applicability for companies of different sizes.



**A**t Wikborg Rein, we recognise that our expertise positions us to assist clients in navigating these developments in a thoughtful and forward-looking manner. This includes helping clients interpret and comply with applicable requirements, while also identifying opportunities to integrate sustainability considerations into governance, risk management, and long-term strategy. Our approach acknowledges that regulatory alignment is not only about compliance, but also about building resilience, accountability, and trust.

Our commitment to sustainability extends beyond internal operations. We support clients in understanding how evolving frameworks and expectations may apply to them, and in contributing to broader societal objectives, including relevant international sustainability goals. By combining legal insight with a practical understanding of regulatory change, we aim to act as a constructive and responsible advisor in a rapidly developing regulatory environment.



**By combining legal insight with a practical understanding of regulatory change, we aim to act as a constructive and responsible advisor in a rapidly developing regulatory environment.**

We recognise that sustainability includes not only the services we provide to clients, but also the way we operate our own business. In line with a VSME-oriented and proportionate approach, we are taking practical steps to manage and gradually reduce our environmental and social impacts.

#### **ENVIRONMENTAL IMPACT AND EMISSIONS**

We aim to limit emissions from our operations through measures such as improved energy efficiency, increased digitalisation, responsible use of resources, and mindful planning of business travel. As a smaller organisation, we focus on realistic and practical improvements that are relevant to our activities.

#### **PROCUREMENT PRACTICES**

In our purchasing decisions, we consider environmental and social aspects where appropriate. We seek to work with suppliers that demonstrate responsible business conduct and compliance with applicable regulations, and we aim for solutions that are proportionate to the size and nature of our operations.

#### **SOCIAL RESPONSIBILITY AND GOVERNANCE**

We prioritise a safe and inclusive working environment, fair treatment, and competence development for our employees. These principles support both our organisational stability and long-term value creation. Our approach is informed by generally recognised sustainability principles, including the UN Global Compact, and we acknowledge the importance of the UN Sustainable Development Goals (SDGs) as a broader global framework. We will continue to improve our practices in a practical and proportionate way, in line with evolving expectations and VSME reporting principles.

The UN's Sustainable Development Goals (SDGs) provides a blueprint for a more sustainable future. While all 17 goals are important, we have identified four of the SDGs as most relevant for our business, and where we can have the greatest impact:

GOAL	RELEVANT TARGETS	HOW WE CONTRIBUTE
 <p><b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS</p>	<p><b>Target 16.5</b></p> <p>Substantially reduce corruption and bribery in all their forms.</p> <p><b>Target 16.6</b></p> <p>Develop effective, accountable and transparent institutions at all levels.</p>	<p>With unwavering commitment we maintain zero tolerance for corruption in all its manifestations. To ensure comprehension and adherence to our ethical guidelines, we regularly provide ethics training to our employees and partners. Each year, new associates partake in ethics courses, reinforcing our steadfast principles. All new hires signs our ethical guidelines. In addition we carry out annual training in lawyer responsibility.</p>
 <p><b>13</b> CLIMATE ACTION</p>	<p><b>Target 13.3</b></p> <p>Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.</p>	<p>We conduct carbon accounting reports with support from CEMAsys, enhancing our environmental accountability. We also initiated the process of setting science-based climate targets in alignment with the Science Based Targets initiative (SBTi), demonstrating a long-term commitment to climate mitigation. Additionally, by publishing detailed information through our Transparency Act report and sustainability disclosures, we contributed to broader awareness-raising efforts among stakeholders, clients, and partners.</p>
 <p><b>10</b> REDUCED INEQUALITIES</p>	<p><b>Target 10.2</b></p> <p>By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.</p> <p><b>Target 10.3</b></p> <p>Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.</p>	<p>We are committed to fostering equality and diversity throughout our organisation. Our Equal Opportunities and Diversity Policy outlines the actions we take to promote the inclusion of all employees, including those with disabilities. The work we do regarding equality, diversity and inclusion is also further described in our annual Equality statement.</p>
 <p><b>5</b> GENDER EQUALITY</p>	<p><b>Target 5.5</b></p> <p>Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.</p>	<p>We strive for gender balance across all levels, recognising the need for progress at partner level. Our objective is to achieve 40% representation of both genders at partner appointments, over a rolling five year period. During the period 2019-2024, 29% of partners, recruited and promoted internally, were women.</p>

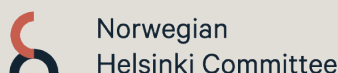
# Partnerships

Over the years, Wikborg Rein has established meaningful partnerships and provided financial support to various organisations. In 2025, we contributed to the following:



## Stine Sofie's Foundation (Stine Sofies Stiftelse)

Stine Sofies Stiftelse is an NGO dedicated to creating a childhood free from violence and abuse. Together, we established Barnas Havarikommisjon, an initiative providing legal protection for children and young people who are victims of violence and abuse, serving as their legal voice towards politicians. The third edition was launched in January 2025.



## The Norwegian Helsinki Committee

The Norwegian Helsinki Committee is an NGO committed to promoting and protecting human rights. Since 2017, Wikborg Rein has provided pro bono legal assistance on sanction laws, helping politicians, the public, and international communities better understand the opportunities provided by law. We regularly assist them with sanctions advisory.



## The Norwegian Organisation for Asylum Seekers (NOAS)

The Norwegian Organisation for Asylum Seekers (NOAS) works to advance asylum seekers' rights in Norway. Through our pro bono collaboration, Wikborg Rein assists in the re-examination of cases, often involving court proceedings, where all appeal rights have been exhausted and financial resources are limited.



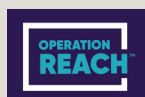
## The Big Issue

The Big Issue is one of the UK's leading social businesses, offering homeless and at-risk individuals the opportunity to earn a legitimate income and reintegrate into society. Wikborg Rein supports The Big Issue through a monthly subscription.



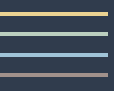
## London Legal Walk

London Legal Walk has for 20 years united the legal community in support of free legal advice services. Wikborg Rein participates by donating and taking part in the Walk.



## Operation Reach

Operation Reach supports students from underprivileged backgrounds through expeditions and mentoring, building confidence and leadership skills. Many go on to top universities, often as the first in their families. Wikborg Rein provides financial support and encourages staff to volunteer as mentors.



# Governance

# Corporate Governance\*

## Governance structure and composition

Wikborg Rein is a private limited company headed by a Managing Partner (MP), supported by a management group including the COO, CFO, and business industry group leaders. The Board, the firm's highest governing body, consists of four partners, and three employee representatives normally elected for two-year terms. A three-member Nomination Committee oversees election processes, with Board selection based on firm knowledge, diversity of perspective, and leadership qualities.

## Roles and responsibilities

The Board is responsible for oversight of Wikborg Rein's impact on the economy, environment, and people, including approving the sustainability report and identifying material topics. Sustainability is embedded in the firm's overall strategy, reviewed annually by the Board. Day-to-day responsibility rests with the MP, while a dedicated Risk and Quality Partner reports directly to the Board on internal risk matters.

## Conflict of interest

Wikborg Rein's internal ethical rules address conflicts of interest, anti-corruption, and anti-money laundering. The firm also maintains an Anti-Discrimination policy and restricts employees' external board positions and securities trading. Critical concerns can be raised directly with Board members or through a whistleblowing policy. Cases reported in 2024 have been investigated and closed in accordance with established procedures.

## Evaluation and remuneration

The Board takes responsibility for ESG matters and is regularly updated on related topics. Board performance is assessed through self-evaluation. Board members receive no remuneration. Senior executive pay is determined by a combination of financial and non-financial KPIs, the latter including leadership quality, cultural contribution, and acting as a positive ambassador for the firm.



\* Per December 2025

## ETHICS AND ANTI-CORRUPTION

Wikborg Rein operates in accordance with national and international laws and regulations on ethics and anti-corruption. The firm's policies include, but are not limited to:

- [Ethical Guidelines](#) (Approved by the Board)
- [Supplier Code of Conduct](#)
- [Anti-bribery Policy](#)
- [Anti-discrimination Policy](#)
- [Whistleblowing Policy](#)
- [Equality Statement 2025](#) (Norwegian)

Wikborg Rein's policy commitment to responsible business conduct is enshrined in the firm's Ethical Guidelines, which articulate the firm's values, working principles and expectations regarding personal and professional conduct. The Ethical Guidelines have been approved by the Board of Wikborg Rein.

Wikborg Rein's Ethical Guidelines are primarily based on the Norwegian Bar Association's Rules of Professional Conduct, which form part of Norwegian law and are in line with international standards, in particular the CCBE (Council of Bars & Law Societies of Europe)'s rules for European lawyers. In certain areas the firm has implemented stricter rules than those set out in the Bar Association's rules or applicable legislation.

As a signatory to the UN Global Compact since 2021, the firm adheres to ten universally recognised principles in the areas of human rights, labour, the environment and anti-corruption, including UNGC Principle 10, which explicitly addresses the firm's work against bribery and corruption in all forms.

## PRACTICAL IMPLEMENTATION

Compliance with laws and regulations is paramount for Wikborg Rein's employees. Upon recruitment, all staff are informed of the firm's ethical guidelines and anti-corruption policy. To promote understanding and compliance with these principles, regular ethics training is provided to employees and partners. In addition, a two-hour introductory course on ethics is held every year for new lawyers.

As part of the client onboarding process, the firm carries out evaluations and risk assessments prior to entering into engagements with clients and contracts

with suppliers. This involves gathering information directly from the client, conducting online searches and using databases. In certain cases, further information is obtained, particularly when entering into contracts with clients in or from countries where the risk of corruption is assessed as higher, based on the Transparency International Index.

To prevent money laundering, a digital client onboarding system has been established to ensure the collection and secure storage of necessary information. A dedicated team of highly qualified and experienced staff has been established to work on anti-money laundering issues. The firm has also developed its own anti-corruption programme, and the ethical guidelines explicitly address the firm's policy regarding fraud and anti-competitive practices.

Ultimate responsibility for the firm's compliance with ethical rules and anti-corruption work lies with the Board. The firm has appointed a Risk & Quality Partner who is responsible for ethical issues and reviewing internal guidelines. All employees are expected to be familiar with the Bar Association's rules of professional conduct as well as Wikborg Rein's own ethical guidelines. The firm and all its lawyers are subject to supervision by the Supervisory Council for the Legal Profession.



**Wikborg Rein's policy commitment to responsible business conduct is enshrined in the firm's Ethical Guidelines, which articulate the firm's values, working principles and expectations regarding personal and professional conduct.**

## CONVICTIONS AND FINES FOR CORRUPTION AND BRIBERY

Indicators	2023	2024	2025
Total number and proportion of confirmed corruption incidents	0	0	0
Total number of confirmed incidents where employees were dismissed or disciplined for corruption	0	0	0
Total number of confirmed incidents where contracts with business partners were terminated due to corruption breaches	0	0	0
Public legal proceedings concerning corruption against the organisation or its employees	0	0	0

**INFORMATION SECURITY**

The firm has robust measures and policies in place to prevent information security breaches. This includes conduct of risk assessments, enhanced staff training and a third-party due diligence programme. The firm’s Incident Response Procedure (IRP) is activated immediately in the event of any breach, to ensure a swift and effective response, limit potential damage and implement necessary remedial measures.

**REVENUE FROM CONTROVERSIAL SECTORS**

Wikborg Rein is a law firm whose revenue derives exclusively from the provision of legal services, billed to clients as professional fees. Although Wikborg Rein advises clients operating in the energy sector and other regulated industries, the firm’s own revenues do not arise from exploration, mining, extraction, distribution,

refining, or production of fossil fuels, chemicals, or electricity. Accordingly, the provision of legal assistance to clients active in these sectors does not constitute revenue from those sectors for the purpose of this disclosure.

Based on the above, Wikborg Rein does not meet any of the exclusion thresholds set out in Article 12.1 and 12.2 of the Commission Delegated Regulation (EU) 2020/1818 and is therefore not excluded from EU Paris-aligned Benchmarks or EU Climate Transition Benchmarks.

Wikborg Rein, with global operations in Norway, the UK, Singapore and China, is directly and indirectly exposed to ethical risk. The firm is committed to not working with clients involved in the pornography or drug industries, and strongly opposes all forms of forced and compulsory labour, including child labour.



**PRACTISES, POLICIES AND FUTURE INITIATIVE**

The senior leader with overall responsibility for sustainability at Wikborg Rein is the Managing Partner, supported by the Board of Directors, which has assumed direct responsibility for ESG matters. The Risk

and Quality Partner and Compliance Manager reports directly to the Board on internal risk-related matters.

The operative responsibility for follow-up and implementation of ESG initiatives lies on the COO and CFO.

Sustainability topic	Policies/practices in place	Future initiatives/targets
<b>Climate change / Carbon emissions</b>	GHG Protocol carbon accounting (CEMASys); energy efficiency; reduced business travel; green procurement; supplier requirements; waste management	SBTi targets validated Oct 2025: 63% Scope 1+2 and 37.5% Scope 3 reduction by 2034
<b>Pollution</b>	N/A – service firm, no industrial production	N/A
<b>Water</b>	N/A – sanitary use only, urban offices with municipal supply	N/A
<b>Biodiversity</b>	N/A – urban offices only, no production facilities near sensitive areas	N/A
<b>Circular economy / Waste</b>	Waste sorting at all offices; paper reduction through digitalisation; green procurement; waste reporting via local suppliers	Reduce total waste volumes; improve recycling rates
<b>Own workforce</b>	Working Environment Act compliance; Employee Handbook; WEC; Equality Statement; Equal Opportunities Policy; Anti-Discrimination Declaration; Whistleblowing Policy (Mitt Varsel); annual health checks; H&S risk assessments	eNPS target >10; illness absence rate <4%; gender balance at partner level
<b>Workers in the value chain</b>	Supplier Code of Conduct; due diligence on forced labour and child labour; Transparency Act Statement	Annual supplier review; continued due diligence
<b>Affected communities</b>	Pro bono programme (2,861 hrs in 2024); partnerships with Stine Sofies Stiftelse, NOAS and Helsinki Committee	Extended partnership with Stine Sofies Stiftelse through 2029
<b>Consumers and end-users</b>	Information security policies; Incident Response Procedure; GDPR compliance	Annual mandatory information security training for all employees
<b>Business conduct / Anti-corruption</b>	Ethical Guidelines (Board-approved); Anti-Bribery Policy; digital Client Intake system; AML team; ethics training; Bar Association supervision	Ethics training every year
<b>Human rights</b>	Human Rights Act; Modern Slavery Act; ILO conventions; OECD Guidelines; Transparency Act; UN Global Compact signatory since 2021	Annual publication of Transparency Act Statement; continued due diligence on forced and child labour in own operations and value chain

**WE SUPPORT****UN COMMITMENTS, STANDARDS AND FRAMEWORK**

Wikborg Rein's environmental management is aligned with internationally recognised standards and initiatives, demonstrating our commitment to sustainable development and the green shift.

Since 2021, we have participated in the UN Global Compact and adhere to its ten principles. We are committed to engaging actively with the UN Global Compact and integrating its principles into our everyday business. Through this engagement, we work to advance respect for human rights, fair labour standards, environmental stewardship and strong anti-corruption practices across our organisation and value chain. Our participation underlines our ambition to contribute to sustainable development and responsible business conduct.

For 2025, Wikborg Rein achieved a Bronze rating from EcoVadis, a leading independent assessor of companies' performance on environmental, social and governance issues.

Wikborg Rein is certified as an Environmental Lighthouse (Miljøfyrtårn), confirming our efforts to reduce our environmental footprint and promote sustainability within the organisation. We are scheduled for re-certification in autumn 2026 and continue our commitment to reducing our environmental footprint and promoting sustainable practices within the organisation.

**Membership associations**

Our lawyers hold memberships in key professional associations:



The Norwegian Bar Association is the representative organisation for lawyers and associates in Norway, dedicated to upholding high professional and ethical standards.



The Norwegian Association of Lawyers serves as a professional network and trade union for lawyers and law students, providing guidance and support throughout their careers.



The Solicitors Regulation Authority (SRA) governs solicitors in England and Wales. Our lawyers in the UK and Singapore are registered with the SRA and maintain their practising status by meeting its requirements.



## Summary goals and targets – Governance

### 1. Ethics, integrity and compliance

- Maintain zero tolerance for corruption, money laundering and other economic crime.
- Ensure regular anti corruption and AML training for all employees, with 100% coverage over a rolling three year period.
- Maintain and update routines for conflicts of interest, client due diligence and whistleblowing.

### 2. ESG governance and risk management

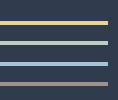
- Integrate sustainability considerations in strategic decisions, risk management and key business processes.

### 3. ESG advisory services

- Further develop ESG related advisory services to support clients in the transition to more sustainable business models.
- Use experience from client work to continuously improve the firm's own sustainability practices.

### 4. Reporting and external standards

- Publish an annual sustainability report in line with recognised frameworks (e.g. VSME).
- Maintain or improve relevant certifications and memberships that support ESG performance (e.g. environmental certifications, UN Global Compact, external ESG ratings).



# Environment



**CLIMATE AND EMISSIONS**

Wikborg Rein integrates climate and environmental considerations into our overall governance, policies and day-to-day operations. Our Code of Conduct and internal ESG guidelines set clear expectations for how we manage our environmental impact, and climate considerations are embedded in our risk assessments, procurement processes and operational routines. Relevant policies are regularly reviewed and updated to reflect evolving regulation, best practice and stakeholder expectations.

**Energy consumption**

Energy category	Renewable (tCO <sub>2</sub> e)		Non-renewable (tCO <sub>2</sub> e)		Sum (tCO <sub>2</sub> e)	
	2024	2025	2024	2025	2024	2025
Electricity	1153,3	1067,6	443,2	328,9	1596,5	1396,5
Fuel	0	0	61,9	20,9	61,9	20,9
Sum	1153,3	1067,6	505,1	349,8	1658,4	1417,4

**Carbon accounting**

Over recent years, we have improved the quality and robustness of our greenhouse gas emissions reporting. In 2024 and 2025, we further strengthened our climate accounting, with particular focus on Scope 3 emissions. This includes increased use of activity-based data and more granular emission factors, improving accuracy, traceability, and comparability. The updated approach provides a more reliable basis for understanding our climate impact and supports our climate ambitions, including our alignment with the Science Based Targets initiative (SBTi).

We commenced systematic carbon accounting in 2019 as a fundamental tool to understand and describe our environmental impact, mitigate climate-related risks and improve our environmental performance. Wikborg Rein’s Annual Carbon Accounting Report, prepared with assistance from CEMAsys, follows the internationally recognised Greenhouse Gas Protocol, which also underpins ISO 14064-1. The report includes CO<sub>2</sub> equivalents (CO<sub>2</sub>e) for CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub>, NF<sub>3</sub> and HFC/PFC gases.

**Policy commitment**

At Wikborg Rein, we are committed to taking a precautionary approach to environmental challenges and to promoting greater environmental responsibility. Our overarching objective is to integrate sustainability into all aspects of our operations while continuously raising awareness to enhance environmental performance.

We have implemented several green measures in our day-to-day operations, including waste sorting, efforts to improve energy efficiency in our offices, and sourcing from suppliers that offer more environmentally friendly options. These operational measures support our science-based climate targets and our broader ESG strategy.

**Emissions and performance**

Our carbon accounting follows the Greenhouse Gas Protocol and covers Scope 1 (direct emissions), Scope 2 (purchased energy), and Scope 3 (other indirect emissions across the value chain). As is typical for the legal services sector, Scope 3 represents the largest share of total emissions, driven primarily by business travel, purchased goods and services, and, to a lesser extent,



commuting and waste. Direct energy use in our offices relates mainly to heating, lighting, and cooling.

The reporting covers our six offices in Oslo, Bergen, Stavanger, London, Shanghai and Singapore. For some categories and locations, emissions are estimated where primary data is not available. Compared with previous years, the 2025 reporting is based on a higher share of activity-based data, resulting in a more representative emissions profile across scopes and categories.

In 2025, Wikborg Rein reported total greenhouse gas emissions of 1,298.3 tonnes of CO<sub>2</sub> equivalents (tCO<sub>2</sub>e). Compared with 2024, this represents a decrease of 16.1%.

The data underlying the various categories have become increasingly detailed and activity-based, incorporating more specific emission factors. This higher level of granularity improves the traceability of calculations and contributes to a more accurate and representative carbon account. The category with the largest increase from the previous year is Scope 3 – Purchased Goods and Services. The continued growth in our employee base has also contributed to some of the increase in certain Scope 3 categories.

For Wikborg Rein, Scope 1 emissions consist primarily of fuel consumption from company-owned vehicles. Currently, only the Shanghai office operates company cars. In 2025, Scope 1 emissions decreased by 66%, from 15.8 tCO<sub>2</sub>e in 2024 to 5.3 tCO<sub>2</sub>e in 2025, mainly due to a reduction in the number of cars.

Scope 2 covers emissions from electricity consumption in our leased offices. Total electricity consumption across all offices increased by around 5% compared with 2024, partly due to an additional office location in 2025. Despite this increase in consumption, location-based Scope 2 emissions decreased slightly over the period 2023–2025, indicating relatively low-carbon electricity (for example in the Nordic region) and ongoing efforts to improve energy efficiency. Market-based Scope 2 emissions, however, have increased and will need to be addressed through measures such as renewable electricity contracts and further efficiency improvements.

Scope 3 covers the company’s indirect emissions throughout its value chain. In 2025, our carbon accounting included six of the 15 Scope 3 categories:

- Purchased goods and services
- Fuel- and energy-related activities
- Upstream transportation and distribution
- Waste
- Business travel
- Employee commuting

Total emissions from these Scope 3 categories amounted to 1,242.8 tCO<sub>2</sub>e in 2025, representing approximately 95.7% of Wikborg Rein’s total greenhouse gas emissions. Scope 3 is therefore our dominant emissions source and the main focus for future reduction measures, particularly in light of our commitment to reduce absolute Scope 3 emissions by 37.5% by 2034 from a 2024 base year.

Emissions (location-based):				
	Unit	2023	2024	2025
Scope 1	tCO <sub>2</sub> e	30.3	15.8	5.3
Scope 2	tCO <sub>2</sub> e	61.3	52.7	50.2
Scope 2 sum with market-based electricity calculations	tCO <sub>2</sub> e	218.7	410.8	531.9
Scope 3	tCO <sub>2</sub> e	989	1,475.2	1,242.8

Emissions intensity	
Indicator	2025
Scope 1 + location-based Scope 2 (tCO <sub>2</sub> e)	55.5
Revenue (NOK)	2 023 830 000
Emissions intensity (tCO <sub>2</sub> e per MNOK in revenue)	0.027 tCO <sub>2</sub> e per MNOK

**Climate goals and SBTi**

In 2024, we began the process of setting science-based climate targets in line with the Science Based Targets initiative (SBTi), a thorough and instructive journey involving data collection, scenario analysis and methodological choices. Our targets were validated by SBTi in October 2025, confirming that they are consistent with the latest climate science and the goals of the Paris Agreement.

This commits us to a structured and transparent approach to reducing greenhouse gas emissions and demonstrates our willingness to take our share of responsibility for a sustainable future. The next step in the SBTi process is to translate the validated targets into concrete action plans, including clear measures, timelines and responsibilities. This work is currently in progress and is expected to be completed in the second half of 2026.

Wikborg Rein has committed to reduce its absolute Scope 1 and 2 greenhouse gas emissions by 63.0% by 2034, from a 2024 base year. In the same period, we also commit to reduce our absolute Scope 3 emissions by 37.5%.

To achieve these science-based targets, we will implement a broad set of measures across our operations and value chain, including:



- **Energy efficiency:** Systematic work to reduce energy use in our offices through technical upgrades, optimised operation, and behaviour change, and by engaging with landlords to improve building performance.



- **Reduced business travel:** Stricter internal guidelines for travel, prioritising virtual meetings and low-carbon transport options where feasible, and integrating emissions considerations into travel planning and approval processes.



- **Green purchasing:** Strengthening our procurement practices to favour low-carbon and resource-efficient products and services, including IT equipment, office supplies and other major purchasing categories.



- **Supplier requirements:** Gradually introducing climate-related requirements and expectations in supplier selection and follow-up, including encouraging key suppliers to measure, report and reduce their emissions, and where relevant to set their own science-based targets.



- **Waste management and sorting:** Reducing overall waste generation and improving sorting rates through better systems, clear procedures, and employee engagement, to increase reuse and recycling and reduce the climate footprint from waste.

These measures will be further detailed and prioritised in our climate action plans, which will include concrete initiatives, responsibilities, timelines and key performance indicators to ensure we stay on track to meet our 2034 targets.

**CLIMATE RISK**

As part of its sustainability work, Wikborg Rein has assessed its exposure to climate-related hazards and transition events that may give rise to material risks for the firm's operations and strategy.

**Physical climate risks**

Wikborg Rein operates exclusively from leased office premises in urban areas across Norway, the UK, Singapore and China. The firm does not own real estate, production facilities, or other physical assets exposed to significant physical climate risks such as flooding, drought, wildfires or extreme heat events.

The firm has assessed the physical climate risk exposure of its offices. At present, none of the firm's office locations have been identified as being in areas with high physical climate risk exposure that would materially affect the firm's ability to operate. The firm considers physical climate risk to be low materiality for its own operations. However, as a legal adviser to clients in sectors such as maritime, energy and real estate, the firm is indirectly affected by the consequences of physical climate risk through its client base.

**Transition risks**

Wikborg Rein recognises that climate transition risks, arising from changes in policies, regulations, technology, and market expectations, may affect the firm in the following ways:



- **Regulatory risk:** Increasing sustainability reporting requirements (such as CSRD/VSME) create both operational requirements and advisory opportunities for the firm.



- **Reputational risk:** Failure to demonstrate credible climate commitments may affect the firm's reputation among clients, employees and business partners who place increasing weight on sustainability performance.



- **Market risk:** Clients in carbon-intensive sectors may face transition risks that affect their need for legal services or their ability to pay for such services.

The firm views regulatory and reputational transition risks as of moderate materiality, and considers them manageable through its existing sustainability programme, including its science-based climate targets and ESG advisory capabilities.

### Time horizons

The firm has assessed climate risks over the following time horizons:

- **Short term (0–3 years):** Increased regulatory reporting demands; near-term SBTi target implementation.
- **Medium term (3–10 years):** Potential changes in client demand and market structure driven by the low-carbon transition; continued expansion of climate regulation in operating jurisdictions.
- **Long term (10+ years):** Physical climate risks to urban infrastructure in operating locations.



**Wikborg Rein has committed to reduce its absolute Scope 1 and 2 greenhouse gas emissions by 63.0% by 2034.**

From a 2024 base year.

### Climate adaptation measures

The firm has taken the following steps to manage and adapt to climate-related risks:

- Implementation of science-based climate targets (SBTi), validated October 2025.
- Integration of climate considerations into procurement, travel policy and operational routines.
- Development of ESG advisory capabilities to support clients in managing their own climate transition risks.

Wikborg Rein will continue to develop its climate risk assessment framework in line with evolving best practices and regulatory expectations. The firm operates in NACE sector M69.10 (Legal activities), which is not classified as a high-climate-impact sector under Annexes I and II of the EU Taxonomy Regulation, and accordingly does not have a mandatory obligation to adopt a formal climate transition plan. Nonetheless, the firm's science-based targets and associated action plans effectively serve the same purpose.





## POLLUTION

### Air, water and soil pollution

As a service-providing law firm, Wikborg Rein does not engage in industrial production and is not subject to any statutory reporting requirements regarding emissions of pollutants. This issue is not considered material for Wikborg Rein.

## BIODIVERSITY

Wikborg Rein operates exclusively from leased office premises in urban areas. The firm does not own any production facilities and operates exclusively from offices in urban areas. The firm's offices are located in Oslo, Bergen, Stavanger, London, Shanghai and Singapore.

None of Wikborg Rein's offices are situated in or adjacent to biodiversity-sensitive areas, nature reserves, protected areas, or areas of importance for threatened or endemic species. The number of sites owned, leased or managed in or near such areas is therefore zero (0), and the total area of such sites is zero (0) hectares.

Given the nature of the firm's activities as a legal services provider with no land use, agricultural activity, or industrial production, biodiversity is not considered a material topic of Wikborg Rein. This assessment will be reviewed as part of future materiality assessments.

## WATER

Water withdrawal is defined as the total volume of water extracted from the public water supply network. All of Wikborg Rein's offices are located in urban areas served by municipal water systems. As a service-providing law firm, the firm's water withdrawal is limited to sanitary use and catering at its office locations.

Due to insufficient data availability across the firm's significant locations, the water withdrawal data point is omitted from this year's report. The firm is developing

data collection procedures to enable reporting on water withdrawal in the next reporting period.

None of the firm's offices are currently identified as being located in high water-stress areas. Accordingly, water consumption is excluded from this year's report, with the assumption that water withdrawn is returned to the municipal water network, resulting in net water consumption of approximately zero. This methodological limitation will be more thoroughly addressed in future reporting periods.

## USE OF RESOURCES, CIRCULARITY AND WASTE

Wikborg Rein is actively working to reduce waste and improve source sorting at all its office locations, including reducing paper consumption through increased digitalisation and prioritising green procurement. As a legal services provider, the firm's material flows consist primarily of paper, IT equipment, office supplies and food waste, and do not involve significant industrial or physical material streams. The topic of material flows from a circular economy perspective is therefore not considered material for Wikborg Rein beyond the categories reported below.

Waste category	2024 (tonnes)	2025 (tonnes)
Total waste generated	88.7	77.2
of which: hazardous waste	0	0
of which: non-hazardous waste	88.7	77.2
Waste directed to material recovery/ recycling	62.0	55.9

Data is collected from waste suppliers at each office location.



## Summary goals and targets – Environment

### 1. Implementation of science based climate targets

- Develop and adopt a concrete climate action plan for achieving our validated science based targets, including measures, responsibilities, budget and timeline, by the end of 2026.
- Integrate emission reduction targets and measures into business planning, travel policies, procurement guidelines and office management in all offices.
- Establish annual internal reduction budgets for Scope 1, 2 and key Scope 3 categories, with defined KPIs and regular reporting to management and the Board.
- Review progress against the climate action plan at least annually and update measures as needed to stay on track for our science based targets.

### 2. Emission reductions and business travel

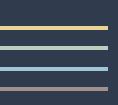
- Reduce greenhouse gas emissions per FTE, with particular focus on business travel, by increasing use of virtual meetings and low carbon transport where feasible.
- Establish annual internal emission budgets for air travel by the end of 2027.

### 3. Office energy and buildings

- Use energy efficient and environmentally certified office buildings where possible (e.g. BREEAM, energy class A).
- Reduce energy consumption per square metre in our Norwegian offices by 8% by 2027 (baseline: 2024).

### 4. Sustainable procurement and waste

- Integrate environmental criteria into key procurement processes (IT equipment, office supplies, catering, travel) by the end of 2027.
- Reduce residual waste and food waste in Norwegian offices by 8% by 2027 (baseline: 2024), and improve waste sorting in all offices.



































































# Social

## WORK FORCE AND RECRUITMENT

As of 31 December 2025, Wikborg Rein boasts a diverse workforce of 414 employees, comprising 201 women and 213 men, representing 23 different nationalities across our six offices. While the majority of our employees hold permanent positions, there is a limited number of part-time and temporary employees. Temporary employees are typically brought in to cover for permanent employees on leave for reasons such as long-term illness and parental leave, or to handle project-based tasks within specific timeframes. To ensure a continuous flow of talent, we

have a comprehensive trainee scheme. We are dedicated to achieving gender balance among our trainees and strive to mirror the diversity that exists among the law students. The trainee scheme serves as a crucial recruitment channel for the company, offering valuable opportunities for professional growth and development for students. Each year we have approximately 65 trainees in our Norwegian offices. In 2025 we had 49 new hires in Norway, 49% were women and 51% were men. 45% of the new hires were recent graduates.

DISTRIBUTION PER CONTRACT TYPE AND OFFICE				
Employee categories (Partners excluded)	Oslo/Bergen/Stavanger	London	Shanghai	Singapore
Permanent employees	 Men: 119  Women: 140	 Men: 20  Women: 29	 Men: 4  Women: 5	 Men: 2  Women: 2
Temporary employees	 Men: -  Women: 5	 Men: 0  Women: 3	 Men: 0  Women: -	 Men: 0  Women: 0
Non-guaranteed hours employees	 Men: 4  Women: 2	 Men: 0  Women: 0	 Men: 0  Women: 0	 Men: 0  Women: 0
Part-time employees 0-69%	 Men: 5  Women: 9	 Men: 1  Women: 0	 Men: 0  Women: 0	 Men: 0  Women: 0
Full-time employees 70%-100%	 Men: 114  Women: 136	 Men: 19  Women: 32	 Men: 4  Women: 5	 Men: 2  Women: 2
New hires	 Men: 25  Women: 24	 Men: 5  Women: 5	 Men: 0  Women: 0	 Men: 0  Women: 1
Turnover	 Men: 9%  Women: 8%	 Men: 2%  Women: 11%	 Men: 0%  Women: 0%	 Men: 0%  Women: 20%
Parental leave	 Men: 10  Women: 22	 Men: 1  Women: 2	 Men: 0  Women: 0	 Men: 0  Women: 0

**COMPETENCE AND PROFESSIONAL DEVELOPMENT**

Wikborg Rein places great importance on providing our workforce with a comprehensive range of training and development initiatives tailored to their specific needs. Investing in growth and development of our employees is crucial for their professional success and contributes to the overall success of our organisation. Our training and development programmes cover a broad range of areas, including onboarding, ethics and human rights, AI and technology, leadership development, internal workshops and knowledge-sharing initiatives, as well as external seminars and conferences. In 2025 a total of 2,350 hours of internal training was provided by Wikborg Rein in Norway. In total for all offices 13,732 hours of both internal and external training was registered for our lawyers and partners. On average, each lawyer and partner participated in 41 hours of training during 2025.

In addition, we conduct annual appraisals with our employees to discuss topics such as individual performance, career plans, development, and wellbeing. We have established policies and measures for our lawyers specifically, incorporating career management, development opportunities, and initiatives to promote career mobility. By offering comprehensive training and development opportunities, Wikborg Rein aims to nurture the skills and expertise of our employees, attract and retain top talent and ensure their continuous professional growth and success.

**WORK ENVIRONMENT AND HEALTH AND SAFETY**

Ensuring the well-being and safety of our employees is a high priority for Wikborg Rein. We have implemented robust measures to ensure a healthy and safe working environment for everyone within our organisation. To proactively address potential health risks, we regularly conduct comprehensive health and safety risk assessments. The assessments allow us to identify key areas of concern, and we implement preventive measures accordingly. Specifically, we have taken steps to address risks related to stress, working hours and repetitive strain injury (RSI). Our employees receive comprehensive training on health and safety risks and best practices, complemented by annual health check-ups for all staff members. Among other things we conduct annual safety rounds in our offices, have fire drills, ergonomic workplace assessments, as well as CPR/First aid training. All new employees are taken on a safety tour of the office premises. In 2025 there were no major work injuries reported.

OCCUPATIONAL ACCIDENTS AND FATALITIES		
Indicator	2024	2025
Number of recordable work-related accidents	1	1
Rate of recordable work-related accidents (per 200,000 hours worked)	0.2857	0.2857
Number of fatalities as a result of work-related injury	0	0



### Sick leave

Our absence rate in Norway due to illness in 2025 was 3.76%, significantly below the national average. Moving forward, our objective is to maintain an absence rate below 4%, reinforcing our commitment to employee well-being and safety.

### Working environment

We strive to foster a working environment where everyone can thrive and succeed. A good working environment is crucial for our ability to recruit, retain, and develop the most talented employees. This, in turn, is a prerequisite for delivering top-notch legal assistance to our clients. Our company culture can be described as 'down-to-earth', emphasising openness, collaboration, and mutual respect. To ensure the well-being, satisfaction and engagement of our employees, we regularly conduct employee surveys. The survey is a vital tool to identify areas where we succeed and where we can improve. We work thoroughly with the findings, and employees are actively involved in the process. Based on the latest survey results, we are pleased to see a high degree of engagement and pride among our employees, indicating a positive work environment. In 2025 our Employee Net Promoter Score (ENPS) was: 25, which reflects the likelihood of our employees recommending our organisation as a place to work (scale: -100 to +100).

We are proud of our top ranking in Universum's student survey 2025 as the most attractive employer for the 12th consecutive year in a row. We are also a leading firm in Prospera's surveys for students and professionals.

At Wikborg Rein, we operate in accordance with the Norwegian Working Environment Act, and our guidelines for working at our firm are outlined in our comprehensive Employee Handbook. All our employees have signed employment contracts and related documents that clearly state their responsibilities and rights. Our Employee Handbook provides information on working hours, remuneration policies, and other important aspects of employment.

Throughout 2025, we strengthened our approach to working time compliance by introducing new monitoring systems, updating procedures and guidelines, and providing targeted training for both employees and team leaders.

To ensure effective management of our working environment, we have a Working Environment Committee (WEC) in compliance with the Norwegian Working Environment Act. The WEC consists of representatives from business support, lawyers and management. Regular meetings are held where a wide range of working environment matters are discussed. Additionally, our lawyers have their own interest body, known as «Fullmektigstyret», which addresses lawyer-specific matters such as promotion and remuneration. Our business support employees also have their own employee representatives who focus on matters related to their working conditions.

### DIVERSITY, EQUALITY AND INCLUSION

At Wikborg Rein, diversity, equality and inclusion are core values that shape the culture of the firm. We believe that different backgrounds and viewpoints can lead to more innovative and effective problem-solving, better decision-making, and a more comprehensive understanding of clients and their needs.

In Wikborg Rein we believe that diversity strengthens us, and inclusivity enables everyone to thrive. We are committed to creating an inclusive environment where everyone feels respected, valued and equal, and can be themselves at work. As Norway's most international law firm, we take pride in having employees from 23 different nationalities across our six offices in Norway and abroad. Multicultural diversity is a competitive advantage for Wikborg Rein. This includes language proficiency, the ability to connect with international clients from different cultures, and awareness and understanding of different business cultures.



**A good working environment is crucial for our ability to recruit, retain, and develop the most talented employees.**

### Policy commitment

Wikborg Rein does not tolerate any form of discrimination with respect to employment and occupation and has a zero-tolerance policy for harassment. The Norwegian Equality and Anti-Discrimination Act sets forth requirements for businesses to uphold with regard to equality and non-discrimination, which of course must be complied with by everyone working for Wikborg Rein and by all of our offices. Our Equality Statement outlines relevant policies, guidelines, activities and objectives. Here is a brief summary of some of the policies and our commitments:

Our Anti-discrimination Declaration clearly expresses our commitment to diversity and our stance on equality and discrimination, including bullying, harassment, and sexual harassment.

- Our [Equal Opportunities and Diversity Policy](#) (Norwegian) outlines the strategy and overall objectives for our efforts to promote equality and prevent discrimination.
- Our [whistleblowing routines](#) provide safe channels and possibilities for both employees, former employees and third parties to report on misconduct.
- Our [Ethical Guidelines](#) are based, among other things, on the 'Rules of Good Legal Practice' and include clear guidelines for whistleblowing regarding unethical behaviour.
- We are Eco-Lighthouse certified. The certification includes requirements for good routines and practices for employee follow-up and working environment.
- We are also EcoVadis certified. The certification sets requirements for good practices and guidelines related to the environment, working conditions, labour and human rights, ethics, and sustainable procurement.
- Considerations for equality and non-discrimination are also included in Wikborg Rein's overall personnel policy, much of which is described in our employee handbook.

### Actions taken



















































Wikborg Rein's work to promote equality and prevent discrimination is defined as strategically important and an integral and natural part of the management of our business. Human Resources (HR) has the overall responsibility for managing this topic, and works closely with union representatives, the board of trustees and the Working Environment Committee (WEC).

#### Activities include:

- An extensive risk assessment of equality and discrimination was carried out in Q4 2025.
- Annual employee survey.
- Focus on internal processes such as recruitment, promotions and remuneration.
- Analysis of distribution of internal work.
- Several gatherings and events.



**Wikborg Rein does not tolerate any form of discrimination with respect to employment and occupation and has a zero-tolerance policy for harassment.**

GENDER DISTRIBUTION				
	Oslo/Bergen/Stavanger	London	Shanghai	Singapore
Organisation total including Partners	 Men: 172  Women: 158	 Men: 31  Women: 34	 Men: 6  Women: 6	 Men: 4  Women: 3
Partners	 Men: 53  Women: 13	 Men: 11  Women: 2	 Men: 2  Women: 1	 Men: 2  Women: 1
Managing Associates / Specialist Counsel / Of Counsel / Legal Directors / Associated Lawyers	 Men: 39  Women: 28	 Men: 5  Women: 10	 Men: 2  Women: 1	 Men: 0  Women: 0
Senior Associates	 Men: 27  Women: 26	 Men: 9  Women: 5	 Men: 1  Women: 2	 Men: 0  Women: 0
Associates	 Men: 32  Women: 45	 Men: 2  Women: 6	 Men: 1  Women: -	 Men: 0  Women: 1
Business Support & Paralegals	 Men: 21  Women: 46	 Men: 4  Women: 11	 Men: 0  Women: 2	 Men: 2  Women: 1
Board of Directors	 Men: 3  Women: 4	N/A	N/A	N/A

Wikborg Rein has an even gender balance at most levels, but with room for improvements at partner level. 49% of all employees working at Wikborg Rein today are women. 43% of the lawyers are women. Among the partners 20% are women. 21% of the workforce work in Business Support, among these 69% are women. Our goal is that at least 40% of both genders are represented in internal partner appointments over a rolling five-year period. During the period 2020–2025, 43% of partners, promoted internally, were women. Based on our internal candidates, it is realistic to expect that we will promote at least as many women as men to senior levels in the forthcoming years. We generally have an even gender distribution at our different offices and strive to maintain this.

22% of senior management roles are held by women. The senior management team consists of Managing Partner, COO, CFO, Industry group leaders and leaders for our Asian offices. 2 out of 9 leaders are women.



**We generally have an even gender distribution at our different offices and strive to maintain this.**

## PAY, COLLECTIVE RIGHTS AND EMPLOYMENT BENEFITS B10)

### Workers' rights and working environment

At Wikborg Rein, we recognise that the success of our law firm heavily relies on the knowledge, skills, and expertise of our workforce. Our employees are our most valuable asset, and their impact on our operations and business success is substantial.

Ensuring a positive working environment is essential for us to thrive as a company. Among other things we achieve this by maintaining active dialogue with our employees and employee representatives, as well as establishing policies and clear guidelines to foster an inclusive and supportive workplace. Failing to secure a good working environment can result in actual or potential negative impacts, such as a bad reputation, high turnover, and difficulties in attracting and retaining talent who are crucial to our success.

### Freedom of association, collective bargaining agreements and employee benefits

In alignment with the Norwegian Working Environment Act, we uphold the principles of freedom of associa-

tion and the right to engage in collective bargaining agreements. Our Norwegian lawyers are members of the Norwegian Bar Association, which serves as the professional body and interest group for lawyers (advokater) and associates (advokatfullmektiger) in Norway. Additionally, our lawyers in the UK and Singapore are registered with the Solicitors Regulation Authority (SRA) and maintain their practising status by meeting the SRA's requirements and obligations. While most of our employees are not covered by collective bargaining agreements, we strive to offer competitive salaries based on position, responsibilities and the market situation. All employees receive at least the statutory minimum wage in their respective countries. In 2023 we implemented a collective bargaining agreement for all associates in Norway.

For our part-time employees working over 20% and employees with contracts of 6 months or more in Norway, we provide a range of employee benefits including: life insurance, health insurance, online mental health assistance, online doctor, disability and invalidity coverage, parental leave and travel insurance. All employees are enrolled in our retirement provision. Employees with contracts shorter than 6 months are only entitled to business travel insurance.

### WAGE DIFFERENCE WOMEN/MEN

Remuneration Norway	Gender balance (Women)	Gender balance (Men)	Wage difference (woman's share of men's salary)
Associates	57%	43%	103%
Senior Associates	53%	47%	102%
Managing Associates / Specialist Counsel	41%	59%	93%
Business Support (no leadership responsibility)	71%	29%	89%

### COLLECTIVE AGREEMENT COVERAGE

Indicator	2025
Percentage of employees covered by a collective agreement	28%

It is just our Associates who are enrolled in the collective agreement.



**Our employees are our most valuable asset, and their impact on our operations and business success is substantial.**

**HUMAN RIGHTS AND DUE DILLIGENCE**

Wikborg Rein fully supports and upholds internationally recognised human rights, and ensures that the firm is not complicit in any form of human rights violation. To ensure compliance, the firm adheres to national and

international laws and regulations relating to human rights, including the Human Rights Act, the Modern Slavery Act, ILO conventions, the OECD Guidelines for Multinational Enterprises and the Norwegian Transparency Act.

HUMAN RIGHTS POLICIES AND PROCESSES		
Question	Answer	Relevant documentation
Does the enterprise have a code of conduct or human rights policy for its own workforce?	YES	<a href="#">Ethical Guidelines</a>
Does this cover child labour?	YES	<a href="#">Ethical Guidelines</a> ; <a href="#">Supplier Code of Conduct</a>
Does this cover forced labour?	YES	<a href="#">Ethical Guidelines</a>
Does this cover human trafficking?	YES	<a href="#">Ethical Guidelines</a>
Does this cover non-discrimination?	YES	<a href="#">Declaration of Anti-discrimination</a> ; Equality Statement 2024; <a href="#">Equal Opportunities and Diversity Policy</a> (Norwegian)
Does this cover accident prevention and health & safety?	YES	Norwegian Working Environment Act; Employee Handbook; health and safety risk assessment procedures; Working Environment Committee (WEC)
Does this cover anything else?	YES	Information security and data privacy (Incident Response Procedure, third-party due diligence programme); rules of professional conduct (Norwegian Bar Association Rules and CCBE Code of Conduct for European Lawyers)
Does the enterprise have a grievance/whistleblowing mechanism for employees?	YES	<a href="#">MittVarsel</a> – digital whistleblowing channel, also accessible to non-employees (clients, former employees, suppliers, etc.)



### Human Rights Policy and Responsible Business Conduct

Wikborg Rein's policy commitment to responsible business conduct is enshrined in the firm's Ethical Guidelines, which articulate the firm's values, working principles and expectations regarding personal and professional conduct. All employees of Wikborg Rein have been made aware of the Ethical Guidelines.

The Ethical Guidelines are primarily based on the Norwegian Bar Association's Rules of Professional Conduct, which form part of Norwegian law and are in line with international standards, in particular the CCBE (Council of Bars & Law Societies of Europe) Code of Conduct for European Lawyers. In certain areas, the firm has implemented stricter rules than those set out in the Bar Association's rules or applicable legislation.

Wikborg Rein strongly opposes all forms of forced and compulsory labour, including child labour.

### Accident Prevention and Health & Safety

Wikborg Rein operates in accordance with the Norwegian Working Environment Act, and the guidelines for working at the firm are set out in the firm's comprehensive Employee Handbook. A Working Environment Committee (WEC) has been established, comprising representatives from business support, lawyers and management, and regular meetings are held at which a broad range of working environment matters are discussed.

Ensuring the wellbeing and safety of employees is a high priority at Wikborg Rein. The firm has implemented robust measures to ensure a healthy and safe working environment for everyone in the organisation. To proactively manage potential health risks, the firm conducts regular and comprehensive health and safety risk assessments. The assessments enable the identification of key areas of concern, and preventive measures are implemented accordingly. The firm has, amongst other things, taken steps to address risks related to repetitive strain injuries (RSI) and stress. Annual safety rounds of office premises, fire drills, ergonomic workplace assessments and CPR/first aid training are also carried out. All new employees undergo a safety induction tour of the office premises.

### Grievance and Whistleblowing Mechanism

The firm has established a digital whistleblowing channel through MittVarsel, where employees can report safety concerns, rule violations or matters such as bullying, sexual harassment and discrimination. The channel is also open to non-employees, such as clients, former employees and suppliers.

The firm's commitment to providing redress for adverse impacts and its approach to identifying and handling complaints are described in its Transparency Act Statement. For further information on Wikborg Rein's work in relation to the Transparency Act, please refer to the Human Rights and [Transparency Act Statement](#), available at [wr.no](http://wr.no).

SEVERE HUMAN RIGHTS INCIDENTS		
Question	Answer	Number of incidents 2025
Does the enterprise have confirmed incidents in its own workforce relating to child labour?	NO	0
Does the enterprise have confirmed incidents in its own workforce relating to forced labour?	NO	0
Does the enterprise have confirmed incidents in its own workforce relating to human trafficking?	NO	0
Does the enterprise have confirmed incidents in its own workforce relating to discrimination?	NO	0
Does the enterprise have confirmed incidents in its own workforce relating to anything else?	NO	0
Is the enterprise aware of confirmed serious incidents among workers in the value chain, affected communities, consumers or end-users?	NO	0



## Summary goals and targets – Social

### 1. Working environment and wellbeing

- Maintain a healthy and inclusive working environment, with sick leave normally below 4% in Norway.
- Continue to monitor working hours and workload and implement measures to prevent stress related illness and repetitive strain injury.

### 2. Employee satisfaction and engagement

- Achieve an Employee Net Promoter Score (ENPS) above 10 in the annual employee survey.
- Follow up survey results with concrete action plans in all departments.

### 3. Diversity, equality and inclusion (DEI)

- Aim for at least 40% of both genders among new partner appointments, measured over a rolling five year period.
- Work towards at least 40% representation of both genders in all lawyer position categories.
- Maintain an even gender distribution in recruitment, with particular focus on leadership positions and practice groups.

### 4. Training and competence development

- Ensure that all employees receive ethics training at least every three years, and that all new lawyers complete an introductory ethics course.
- Provide annual mandatory training in information security for all employees.
- Offer systematic professional and skills development, including leadership training and mentoring.

### 5. Trainee and early career development

- Ensure that a significant share of new graduates hired as associates have previously been trainees in the firm.

### 6. Community engagement and pro bono

- Continue to support selected pro bono partners and projects that promote access to justice and human rights.
- Offer pro bono legal services and financial support within defined focus areas, with annual reporting on scope and impact.

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